

RESPONSE TO INFORMATION REQUEST

The following is the response of James River Corporation's Green Bay, Wisconsin mill (James River) to the information request of the Fish and Wildlife Service, United States Department of the Interior. In responding to the information request, James River admits no liability for any alleged damages to the Fox River and expressly reserves any and all applicable defenses.

James River acquired the Green Bay mill through an Asset Purchase Agreement between James River Corporation and American Can Company dated July 2, 1982. James River is not responsible for any actions or damages occurring prior to its acquisition in 1982. In addition, in the Asset Purchase Agreement, American Can retained all liability for all off-site environmental conditions associated with activities prior to James River's ownership. The successor to American Can Company is MRC Holdings, Inc. Any liability for matters pertinent to this information request prior to July 2, 1982, is the responsibility of MRC Holdings, Inc.

Notwithstanding this discussion of corporate succession, environmental records pertaining to the period prior to July 2, 1982, remain in the possession of the Green Bay mill, have been reviewed in the preparation of this response, and are produced to the extent they are responsive to the information request. Similarly, employees of the mill who worked prior to 1982 were also contacted in this regard. In short, all responsive records and information for periods both before and after 1982 are provided in this response.

Records in the custody of or information provided by Bruce B. Robertson, Bob Overly, Tom Bast, Mary Adrains, Ron Brunner, Meg Deem, Karen Diring, and Tom McDonald were relied on to respond to each question. Mr. Stinchfield was consulted for general process information. Mr. Donaldson's files were also reviewed.

1. The following persons were consulted in the preparation of answers to the information request:

Bruce B. Robertson, Manager of Environmental Affairs
Bob Overly, Environmental Specialist
Tom Bast, Environmental Supervision
Mary Adrains, Procurement Specialist
Ron Brunner, Mill Historian
Meg Deem, Process Stream Analyst
Karen Diring, Process Stream Analyst
Tom McDonald, Process Stream Resource
Larry Fink, Engineering and Maintenance
Al Alexander, Engineering and Maintenance

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The address for all of the above persons is:
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James River Corporation
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Cynthia V. Bailey
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(Attorney for MRC Holdings, Inc.)

2. Documents consulted in the preparation of this response are enclosed. The mill has a limited retention time for financial records such as purchase orders, invoices, and contracts. As such, many applicable financial records were not available for consultation except for recent

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records. Environmental records are retained for a longer period of time, and those produced date as far back as the early 1970s. Due to the volume of records searched, some documents may be duplicative or contain duplicative information. Some documents relate to multiple questions.

3. Tom Anderson was a pollution control engineer at the mill in the 1970s. James River was unable to locate Mr. Anderson.
4. James River is aware of no specific instances. From government documents and media reports, James River is aware of the ongoing review by the Fish and Wildlife Service and presumes that the focus should be on those entities producing and recycling carbonless copy paper in the 1960s and 1970s.
5. James River attempted to locate and interview all persons having knowledge about the generation, transportation, treatment, disposal or other handling of pollutants or hazardous substances, including polychlorinated biphenyls (PCBs), by the Green Bay mill. These persons are identified in the introduction and in the response to Question 1.
6. Copies of pertinent documents are enclosed. *See* response to Question 2.
7. To the knowledge of persons interviewed in preparing this response and subject to the documents reviewed, at no time has the papermaking process at the Green Bay mill resulted in the generation or release of PCBs nor has James River added PCBs to any product produced at the mill.

OVERVIEW OF OPERATIONS

Starting in the early 1900s, up to nine paper machines have been used at the mill at various times to produce tissue paper which was then converted into towel, napkin and tissue products. Other paper products were produced during World War II but there is little record of what those products were. Beginning in 1977, an airlaid machine also produced latex coated substrate for production into towels, wipes, and the direct sale of substrate. The general sources described below supplied pulp fiber as raw materials. The pulp fiber is then blended on paper machines.

SULFITE PULPING OPERATIONS

From 1916 until December, 1992, the Green Bay mill used a sulfite pulping process to process hardwood and softwood logs or chips into bleached chemical pulp. In the sulfite process,

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softwood chips were treated with calcium bisulfite cooking liquor and steam. Following separation of spent sulfite liquor from the cellulose fibers, the pulp then underwent a single-stage bleaching process which used calcium hypochlorite as a bleaching agent followed by three stage washing. Starting in 1953, most of the spent pulping liquor, known as "red liquor" (or spent sulfite liquor) was collected, concentrated in an evaporator, and processed into various spent sulfite liquor liquid and spray dried products used for, among other things, road binder, feed pellet binder, drilling mud and dye dispersants. Prior to 1975, uncollected red liquor and other wastes from the sulfite pulping process were discharged either to the Green Bay mill's wastewater treatment settling lagoons or directly to the East or Fox Rivers. Starting in 1975, low BOD wastes were sent to the Green Bay mill's treatment plant prior to discharge to the Fox River and the high BOD wastes were sent to the Green Bay municipal sewer district (GBMSD). Wastewater from the paper machines was treated in the mill's wastewater treatment plant and the treated effluent was discharged to the Fox River.

GROUNDWOOD PULPING OPERATION

For an unknown number of years but ending in March 1975, groundwood pulp was produced by grinding logs to a pulp with large grindstones. The groundwood pulp was then bleached using one stage of calcium hypochlorite bleach liquor without washing prior to blending on the paper machines. There was very little effluent from the groundwood process and no other chemicals are believed to have been used in the process.

RECYCLING OF WASTE PAPER

Starting very late in 1989, a deinking plant, designed to produce 200 tons per day, began producing bleached deinked pulp. In the deinking process, previously bleached recovered paper is slurried with water in a large pulper, washed, screened and cleaned in several different stages, and bleached with sodium hypochlorite bleach liquor in a one stage bleach tower. For the first several months of operation, caustic was added to the pulper. Since that time, deinking chemicals, slime control agents, polymers, bleach liquor, and antichlor have been the only chemicals used in the deinking process.

For the first several years the facility deinked waste paper that was pre-consumer (or post-industrial) waste. Grades that make up over 90% of the waste paper consisted of coating book and white and colored ledger. Pre-consumer waste paper is generally recycled within days of its generation.

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Since about 1995 the plant has slowly increased post-consumer waste usage to about 50 percent of the raw material. Over 90% of post-consumer waste grades have been composed of white and colored ledger. Waste water from the deinking process is discharged to the GBMSD.

PURCHASED PULP

Beginning with trials in about 1980 and production sometime after that, the mill began purchasing small amounts of wet lapped deinked pulp from Ponderosa Pulp in Oshkosh, Wisconsin. Use of this material gradually increased to about 95 tons per day until the deink plant production was adequate to displace it. Until about mid-1995, the mill also purchased post consumer waste deinked pulp for products that were required to meet the United States Environmental Protection Agency post-consumer waste requirements.

All other fiber used at the mill (with the exception of mill recycled "broke") was hardwood or softwood kraft (*i.e.* virgin pulp) purchased from outside sources or one of the other James River or American Can mills.

8. James River Corporation did not process *any* waste paper until late 1989 when the deinking plant commenced operations. As noted in the response to question 7, James River recycled primarily pre-consumer waste paper (which would not have contained carbonless copy paper)¹ from 1989 until 1995. It is unlikely that any carbonless copy paper was processed, if at all, until 1995, some 24 years after the last production of carbonless copy paper.

9. See response to Questions 7 and 8.

10. The following table shows the volume of waste paper re-processed (deinked) at the mill, the percent of the waste paper that was post-consumer waste and the tons per fiscal year of deinked pulp purchased since 1985.

WASTE PAPER & DEINKED PULP PURCHASED			
FISCAL YEAR	TONS OF WASTE PAPER	% POST- CONSUMER WASTE	TONS PURCHASED DEINKED PULP
1985	0	0	8,940
1986	0	0	12,271

¹ By "carbonless copy paper," James River assumes that the question refers to paper produced by National Cash Register Company from approximately 1957 to 1971 that contained PCBs.

1987	0	0	27,720
1988	0	0	32,140
1989	Est. 5,160	0	33,651
1990	80,645	0	2,236
1991	100,550	0.1	2,262
1992	93,945	5.8	1,612
1993	116,275	5.6	1,292
1994	120,929	10.1	5,427
1995	125,969	34.7	2,212

11. The papermaking process at the mill does not produce or use PCBs. As seen in the documents included in the responses to Questions 2, 6, and 13, there have been a few instances in which low levels of PCBs have been detected in discharges. Samples of incoming process water from the Fox River have shown detectable amounts of PCBs in the same order of magnitude of concentration.

In 1973, a contractor's truck hit a PCB transformer causing a release of dielectric fluid. Most of the fluid collected in sump pump pits, although some entered drains to the storm sewer. The material was heavier than water and was apparently not very mobile. A septic system cleaning service was retained to vacuum standing water and muck from the storm sewer and sump pump pits. This material was discarded off-site at a landfill recommended by the Wisconsin Department of Natural Resources. Asphalt was likewise removed and discarded off-site. Documents pertaining to this spill and cleanup are included in the response to questions 6 and 13.

12. See response to Question 7 and documents supplied in response to Questions 2, 6, and 13.

13. Copies of documents are enclosed. See response to Question 2.

14. See response to Question 7 and documents supplied in response to Questions 2, 6, and 13.

15. Discharges to the Green Bay municipal sewer district from the James River Green Bay mill occurred in accordance with the mill's contract with the GBMSD, pretreatment permits issued to the mill and in accordance with the GBMSD sewer use ordinance. Documents pertaining to these discharges are included in the responses to questions 6 and 13.

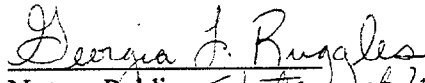
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CERTIFICATION

I certify that the written response provided above, and all information contained therein, are true and accurate to the best of my knowledge and belief and are a result of a diligent search for information responsive to this request.


Bruce B. Robertson

Sworn to before me this 6th
day of May, 1996.


Notary Public State of Wisconsin, County of Brown
My commission expires: August 18, 1996

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